

3/12/2014  
Dr. Varughese can  
take the depositions  
there two witnesses  
before 5/1/2014  
without regard  
to any previously  
imposed stay. She  
will have to  
arrange to  
pay for same (and  
a court reporter (and  
The depositions will  
be taken here  
in the US Courthouse  
so the  
Magistrate  
judge can  
be amiable  
to rule  
on  
objections.

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March 4, 2014

VIA Express Mail  
Clerk of Court  
United States District Court  
Southern District of New York  
United States Courthouse  
500 Pearl Street  
New York, NY 10007-1312

Re: Leena Varughese, M.D. v. Mount Sinai Medical Center, et al.  
Civil Action No. 12-cv-8812 (CM) (JCF)

Dear Honorable Judge McMahon:

MEMO ENDORSED

I am the plaintiff in the above-referenced matter. I would like to proceed with discovery and conduct depositions of the two witnesses Drs. Adriennne Jordan and Elizabeth Morency. These depositions have been hampered and contested by motions to quash, illnesses, Mr. Wronko's motions to be relieved as counsel, and sometimes without any explanation. These witnesses are also in fellowship jobs that last one year after commencement in late June or first week of July each year. These jobs are transitional and essentially just supervised medical practice covering further work and more exposure to the practice of Anatomic and Clinical Pathology.

Mr. McEvoy has stated that there is a stay on discovery in May 2014 based on the 1-30-2014 ruling by Magistrate Judge Francis (Docket #112) and the 2-21-2014 ruling by Your Honor on Mr. Wronko's motion to be relieved as counsel. The 2-21-2014 order allows for an extension of 80 days on all previous deadlines, which places the new deadlines for completion of discovery during first week of May 2014. The depositions of these two witnesses have been unequivocally granted by the court and I would like to obtain these depositions in the next three weeks. Dr. Jordan is represented by her own attorney, Ms. G. Brenda Coey, as well as the defendant's counsels, who have collaboratively stated and convinced themselves that there is a stay on discovery preventing deposition or discovery from proceeding (Exhibit A).

Delaying discovery until past May 2014 will limit my ability to depose the witnesses if they leave their current employment and geographic locations, and technically, the new

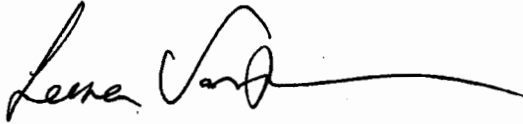
Copies ~~mailed~~ faxed/handed to counsel on 3/13/14

extensions of another 80 days will pass. I would like to complete the depositions of these very involved and key figures in my employment termination without further ado.

This brings me to my second concern, when Mr. Wronko's filed the first motion to be relieved as counsel, I spoke to numerous employment attorneys who expressed the concern of Mr. Wronko's management of my case and extensive work already completed according to Mr. Wronko's discretion as a limiting factor precluding their willingness to represent me. Therefore, it's reasonable for me to assume that it would be difficult to obtain new attorney with my limited resources and criticisms of Mr. Wronko's work. If there is in fact a stay on discovery as the defense counsel and Ms. Coey has argued, please remove the stay on discovery so that I may proceed with the case.

Thank you for your consideration on this matter.

Sincerely Yours,

A handwritten signature in black ink, appearing to read 'Leena Varughese', followed by a long horizontal flourish.

Leena Varughese, M.D.

Encl.

cc: Rory McEvoy, Esq. (Via Express Mail)